

**FILED**

APR 20 2015

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	No. CR-13-00408-JST
Plaintiff,	)	Case No. 10-CV-05408-JST (related case)
v.	)	<b>STIPULATION AND [PROPOSED] ORDER</b>
MUZAFFAR HUSSAIN,	)	
Defendant.	)	

1. The United States and the defendant, Muzaffar Hussain, through undersigned counsel, hereby stipulate and agree as follows:

2. The United States is prepared to produce to defendant's counsel of record in this matter Memorandums of Interview in this case.

3. Defendant will not discuss the Memorandums of Interview, or the contents thereof, with any of ~~these individuals~~. Defendant's counsel of record may discuss the Memorandums of Interview with any or all of these individuals and the contents thereof for the purpose of preparing and evaluating the defense in this proceeding.

4. The documents described above shall not be copied at all unless copying is necessary for preparation of the defense in this proceeding. No copy of the materials stated herein shall be in the

1 possession of the defendant outside the presence of his counsel of record.

2 5. Any copy of the materials stated herein shall be accompanied by a copy of this  
3 Stipulation and Order. No document or copy thereof shall be left with any defense witness.

4 6. Defendant's pretrial release conditions shall be amended to include defendant's  
5 compliance with this protective order, and appropriate sanctions may be imposed for any violation of  
6 this condition.

7 DATED: 4/17/2015

s/ Jose A. Oliveira  
CYNTHIA STIER  
JOSE A. OLIVERA  
Assistant United States Attorneys

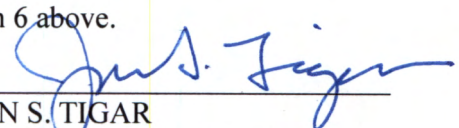
10 DATED: 4/17/2015

s/ David J. Cohen  
DAVID J. COHEN  
Counsel for Muzaffar Hussain

13 ORDER

14 10. In light of the stipulation and agreement of the parties to this action, and good cause  
15 appearing therefor, it is HEREBY ORDERED that disclosure of the above-described information shall  
16 be restricted as set forth in Paragraphs 1 through 6 above.

17 DATED: 4/20/15

  
JON S. TIGAR  
United States District Judge